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October 5, 2004

Stacy J. Silveira, Esq.
General Counsel
Brandon Associates, LLC
160 Commonwealth Avenue
Boston, Massachusetts 02116

Re: Brandon Associates, LLC v. Failsafe Air Safety Systems Corp.
U.S. District Court (District of Mass.) Case No. 04 12013 NMG

Dear Ms. Silveira:

Please be advised that this office represents Failsafe Air Safety Systems Corp, El Con Medical, Debra Espe, and Alan R. Feuerstein, Esq. relative to the Amended Complaint that you have filed in the United States District Court for the District of Massachusetts (Civil Number 0412013NMG).

I have reviewed the allegations of your Amended Complaint and it is obvious that your Amended Complaint has no merit whatsoever.

Your Amended Complaint filed against our clients has been presented for improper purposes, including harassment, delay, and the increase of costs of litigation. Your claims are not warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing law. Your factual allegations have no evidentiary support and they are not likely to have evidentiary support after a reasonable opportunity for further discovery or investigation. Therefore, demand is hereby made for you to withdraw your Amended Complaint.

If you fail to withdraw your Amended Complaint, this correspondence will be utilized as evidence that you have violated Rule 11 of the Federal Rules of Civil Procedure.

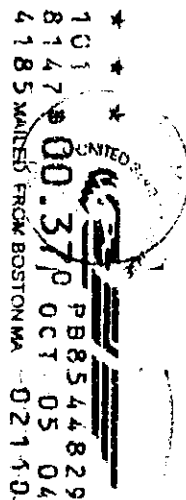
Very truly yours,


Laurie M. Ruskin

cc: Failsafe Air Safety Systems Corp.

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